

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on July 10, 2018.

Permit Number: **R30-05300004-2018 (MM02 & MM03)**
Application Received: **May 10, 2019 (MM02) and May 15, 2019 (MM03)**
Plant Identification Number: **03-54-053-00004**
Permittee: **Felman Production LLC**
Mailing Address: **4442 Graham Station Road, Letart, WV 25253-8701**

Permit Action Number: *MM02 & MM03* Revised: *April 20, 2021*

Physical Location:	New Haven, Mason County, West Virginia
UTM Coordinates:	419.73 km Easting • 4312.468 km Northing • Zone 17
Directions:	Approximately 4 miles east of New Haven adjacent to US Route 33.

Facility Description

Felman Production LLC manufactures manganese, silicon-based ferroalloys, and ferrosilicon and is covered by Standard Industrial Classification (SIC) codes 3313 and 3341. The facility consists of three electric submerged arc furnaces, associated sizing equipment and environmental controls. This modification permit incorporates changes authorized by modifications to NSR permits R13-2857E and R13-3217A.

Emissions Summary

This modification results in the following potential emission changes:

Regulated Pollutants	MM02 Tons per year	MM03 Tons per year	Total Changes After Modification (tpy)
Carbon Monoxide (CO)	-1.08	--	-1.08
Nitrogen Oxides (NO _x)	-5.07	--	-5.07
Particulate Matter (PM _{2.5})	-4.52	-0.54	-5.06
Particulate Matter (PM ₁₀)	-14.34	-1.69	-16.03
Total Particulate Matter (TSP)	- 59.1	-3.58	-62.68
Sulfur Dioxide (SO ₂)	-0.33	--	-0.33
Volatile Organic Compounds (VOC)	-0.39	--	-0.39
Manganese	-2.55	--	-2.55

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 1,145.17 tons per year of CO; 249.24 tons per year of PM₁₀; 1,202.83 tons per year of SO₂; 878.60 tons per year of VOCs, and 48.82 tons per year of Manganese. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Felman Production LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR13

Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation

45CSR30

Requirements For Operating Permits

State Only:

None

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2857E	December 6, 2019	
R13-3217A	June 19, 2019	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This minor modification incorporates revisions associated with minor modification application MM02 and minor modification application MM03. MM02 incorporates the changes associated with permit R13-2857E to replace a 6 TPH pelletizer with an 8 TPH pelletizer and to remove various pieces of equipment including the barge load-out screen/diesel engine and the Bivitech screen/diesel engine. It also removes Emission Unit 009-02 "Crushing and Screening System #2" and Emission Unit 00C-01 "Ladle Burners (Two Systems)" which are not associated with an NSR permit. MM03 incorporates the changes associated with permit R13-3217A to remove a sizing screen and associated feeder equipment and belt conveyors.

Below are the substantial revisions made to R30-05300004-2018 (SM01) resulting from the incorporation of R13-2857E, R13-3217A and the removal of 009-02 and 00C-01:

- 1) **Section 1.1. Emission Units Table** – Updated the table to remove various equipment and to add Pelletizer PT-2. Since Emission Units OS-1C, OS-2C, OS-1P, CR-01B, and OCS3 are permitted under R13-2857, they have been relocated to the section under "Equipment permitted under R13-2857" in the table.
- 2) **Condition 3.5.3.** – Updated US EPA mailing information.
- 3) **Section 5.0** – Removed 009-02 and 00C-01 from the section heading and removed the reference to 009-02 from the citation of authority in condition 5.1.3.
- 4) **Section 6.0** – Replaced Pelletizer PT-1 with PT-2 in condition 6.1.2. and deleted various equipment and associated requirements as deleted in permit R13-2857E.
 - Condition 6.2.4. contained requirements for the Bivitec and barge screening engines from 40 CFR 63 Subpart ZZZZ and condition 4.2.5. of Permit R13-2857. Since the Bivitec and barge screening engines have been removed and although the requirement is still part of R13-2857E, the requirements of this condition are no longer applicable. Therefore condition 6.2.4. has been deleted from the Title V permit.

- 5) **Section 7.0** – Deleted various equipment and associated requirements as deleted in permit R13-3217A.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	Not Applicable for Minor Modification
Ending Date:	NA

Point of Contact

All written comments should be addressed to the following individual and office:

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41910
frederick.tipane@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.